

REMARKS

Claims 1-38 are all the claims currently pending. Claims 1-3, 6-9, 11, 13, 16-19, 21, 23, 26-29, and 31-38 are amended. No claims are added or canceled, and no new subject matter is added. In view of the following comments, reconsideration and allowance of all the claims is anticipated.

Rejections Under 35 U.S.C § 103

Claims 1-38 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious in view of U.S. Patent No. 6,377,949 to Gilmour. Applicants traverse the rejection on the following grounds.

Independent claim 1 includes the feature of, among other things, creating document links in the content catalog, wherein the document links link to the plurality of documents stored in the document management system, and the document links are organized in the content catalog based on the closeness values, and creating a user link in the content catalog, wherein the user link links to the user profile stored in the user profile repository, and the user link is organized in the content catalog based on the affinity strength of the affinity. Independent claims 11, 21, and 31 include similar subject matter, among other things.

In an exemplary embodiment, a user may create a document within a document management system. When the document is created, a topic generator may generate one or more topics based on the content in the document, and closeness values may be determined between each topic and content in the document (see the specification at page 8, lines 13-15). Based on the new topic/document relationships created between the document and the topics, a content catalog may be updated to reflect the relationships (see the specification at page 8, line 13). The content catalog may include a collection of topics with links to documents in the document management system (see the specification at page 5, lines 1-3; and FIG. 1). Based on the user's activity on the

document (and/or other documents in the document management system), an affinity may be generated between the user and a topic that includes an affinity strength which represents the strength of the user's connection to the topic (see the specification at page 6, lines 20-23). The affinity may be stored in a user profile associated with the user (see the specification at page 6, lines 19 and 20; and page 7, lines 3 and 4). A link to the user profile may be created within the content catalog, the link may be organized within content catalog based on the affinity strength of the affinity between the topic and the user (see the specification at page 7, lines 7-10; and FIGS. 1 and 4).

The Examiner acknowledges that Gilmour is deficient at least for failing to teach a content catalog (see the Office Action at page 3, lines 16-18). The Examiner apparently seeks to solve this deficiency by taking Official Notice that the use of a content catalog to access content based on confidence level values, as an alternative to an electronic mail message, was well known at the time of the invention. However, the Examiner fails to provide support for the claimed features of the content catalog. Additionally, Applicants challenge the Examiner's assertion as not being based upon common knowledge, and require the Examiner to provide support for the taking of Official Notice with adequate documentary evidence in accordance with section 2144.04 of the MPEP.

Additionally, even if the Official Notice is accepted *arguendo*, Gilmour does not teach or suggest at least the above-recited feature of the claimed invention. Gilmour appears to teach a system that enables a query to be submitted to a knowledge repository by a user, where terms in the query are compared to a number of user profiles associated with a plurality of other users with a view to detecting user profiles that correspond to the terms in the query (see Gilmour at col. 5, lines 33-52). The user profiles include confidence level values that represent a strength of expertise and/or interest in a knowledge term (see Gilmour at col. 5, lines 1-7). The knowledge terms are obtained, and the confidence level values generated, based on intercepted emails (see Gilmour at col. 4, line 58-col. 5, line 7). Based on the comparison between the

user profiles and the terms in the query, the user profiles that include knowledge terms that correspond to the query may be presented to the user that submitted the query so the user may contact selected ones of the other users that have knowledge about the subject matter of the query (see Gilmour at col. 5, line 54-col. 6, line 4). Thus, Gilour merely discloses searching an existing user profile. However, Gilmour does not disclose enabling the querying user to store, organize, link, modify, or otherwise access the intercepted emails. Therefore, Gilmour does not teach or suggest creating document links in the content catalog, wherein the document links link to the plurality of documents stored in the document management system, and the document links are organized in the content catalog based on the closeness values between the plurality of documents and the plurality of topics, and creating a user link in the content catalog, wherein the user link links to the user profile stored in the user profile repository, and the user link is organized in the content catalog based on the affinity strength of the affinity between the topic and the user.

Accordingly the rejection of independent claims 1, 11, 21, and 31 must be withdrawn. Further, claims 2-10, 12-20, 22-30, and 32-38 depend from corresponding ones of the independent claims, and are patentable over the cited reference based upon this dependency, as well as for the features that they add to the independent claims.

**Patent Application
Attorney Docket No. 042846-0313087
Reply and Amendment**

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Dated: July 29, 2005

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Sean L. Ingram', is written over a horizontal line.

Sean L. Ingram
Registration No.: 48,283
PILLSBURY WINTHROP SHAW PITTMAN LLP
1600 Tysons Blvd.
McLean, Virginia 22102
703-905-2000